ELLIS: LAWHORNE

John J. Pringle, Jr. Direct dial: 803/343-1270 jpringle@ellislawhorne.com S. C. PUBLIC SERVICE COMMISSION

E. C. E. L. V. E. J.

AUG 0 1 2005

July 29, 2005

VIA ELECTRONIC MAIL AND FIRST-CLASS MAIL SERVICE

The Honorable Charles L.A. Terreni Chief Clerk South Carolina Public Service Commission Post Office Drawer 11649

RE:

Columbia, South Carolina 29211

Application of Rock Hill Telephone Company, d/b/a Comporium

Communications, Lancaster Telephone Company, d/b/a Comporium Communications, and Fort Mill Telephone Company, d/b/a Comporium

Communications for an Alternative Regulation Plan Docket No. 2005-203-C, Our File No. 1068-10320

Dear Mr. Terreni:

Enclosed is the original and ten (10) copies of the **Petition to Intervene** filed by RedSquare Corporation in the above-referenced docket.

Please acknowledge your receipt of this document by file-stamping the copy of this letter enclosed, and returning it in the enclosed envelope. By copy of this letter, I am serving all parties of record with this document and enclose my Certificate of Service to that effect.

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If you have any questions or need additional information, please do not hesitate to contact me.

With kind regards, I am

Very truly yours,

John J. Pringle, Jr.

JJP/cr

cc:

Office of Regulatory Staff (via electronic and first-class mail service)

Daniel L. Wentz (via electronic mail service)

All parties of record (via electronic and first-class mail service)

Enclosures

BEFORE THE PUBLIC SERVICE COMMISSION OF SOUTH CAROLINA

DOCKET NO. 2005-203-C



IN RE:

Application of Rock Hill Telephone
Company d/b/a Comporium
Communications ("Rock Hill"),
Lancaster Telephone Company d/b/a
Comporium Communications
("Lancaster") and Fort Mill Telephone
Company d/b/a Comporium
Communications ("Fort Mill")
(collectively the Comporium
Companies) for an Alternative
Regulation Plan

CERTIFICATE OF SERVICE

This is to certify that I have caused to be served this day, one (1) copy of the **Petition to Intervene** by placing a copy of same in the care and custody of the United States Postal Service (unless otherwise specified), with proper first-class postage affixed hereto and addressed as follows:

M. John Bowen, Esquire McNair Law Firm, PA PO Box 11390 Columbia SC 29211

Office of Regulatory Staff
Legal Department
PO Box 11263
Columbia SC 29211

Carol Roof

July 29, 2005 Columbia, South Carolina

BEFORE THE PUBLIC SERVICE COMMISSION OF SOUTH CAROLINA

DOCKET NO. 2005-203-C

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IN RE:

Application of Rock Hill Telephone
Company d/b/a Comporium
Communications ("Rock Hill"),
Lancaster Telephone Company d/b/a
Comporium Communications
("Lancaster") and Fort Mill Telephone
Company d/b/a Comporium
Communications ("Fort Mill")
(collectively the Comporium
Companies) for an Alternative
Regulation Plan

PETITION TO INTERVENE

RedSquare Corporation ("RedSquare" or "Petitioner"), by its undersigned attorney, hereby

Petitions the South Carolina Public Service Commission (the "Commission"), pursuant to Rule 103836 of the Commission's Rules, for an order allowing Petitioner to intervene in the above-captioned

Docket, with full rights to participate as a party of record. In support of its Petition, Petitioner would show the Commission the following:

- 1. RedSquare is a full-service integrated service provider authorized by the Commission to provide local exchange and interexchange telecommunications services organized under the laws of the State of Nevada. RedSquare holds a certificate of public convenience and necessity from this Commission granted in Docket No. 2004-43-C, on September 7, 2004 by Order No. 2004-425.
 - 2. Rock Hill Telephone Company d/b/a Comporium Communications ("Rock Hill"),

Lancaster Telephone Company d/b/a Comporium Communications ("Lancaster"), and Fort Mill Telephone Company d/b/a Comporium Communications ("Fort Mill"), (collectively "the Comporium Companies") filed its Application with this Commission on July 1, 2005 requesting Commission approval of its Alternative Regulation Plan. Specifically, the Comporium Companies' Application states, pursuant to S.C. Code Ann. § 58-9-576(A), wherein any local exchange carrier ("LEC") may elect to have the rates, terms, and conditions of its services determined pursuant to the alternative regulation plan described in S.C. Code Ann. § 58-9-576(B), provided the Commission (1) has approved a local interconnection agreement in which the LEC is a participant with an entity determined by the Commission not to be affiliated with the LEC, (2) determines that another provider's service compete with the LEC's basic local exchange telephone service, or (3) determines that at least two wireless providers have coverage generally available in the LEC's service area and that the providers are not affiliates of the LEC. In summary, the Comporium Companies elect to have the rates, terms, and conditions of their services determined pursuant to the alternative regulation plan described in the Application, which conforms with the plan described in S.C. Code Ann. § 58-9-576(B).

- 3. As a telecommunications provider holding a certificate issued by this Commission, Petitioner has an interest in this Docket.
 - 4. Petitioner has not yet formulated its position with respect to this Docket.
 - 5. The full names and addresses of the authorized representatives of Petitioner are:

John J. Pringle, Jr. Ellis, Lawhorne & Sims, P.A. P.O. Box 2285 Columbia SC 29202

Telephone: 803/343-1270 Facsimile: 803/799-8479 jpringle@ellislawhorne.com

6. Petitioner asserts that the granting of its Petition to Intervene will not in any way delay the proceedings in this Docket.

WHEREFORE, Petitioner prays for the Commission to:

- a) Grant this Petition to Intervene and make Petitioner a party of record in Docket Number 2005-203-C, allowing Petitioner to participate fully and take such positions as it deems advisable; and
- b) Grant such other relief as the Commission deems just and proper.

Respectfully submitted,

ELLIS, LAWHORNE & SIMS, P.A.

John J. Pringle, Jr., Esqvire⁰ 1501 Main Street, Fifth Floor

P.O. Box 2285

Columbia, South Carolina 29202

Attorney for Petitioner

July 29, 2005 Columbia, South Carolina